

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
IN ADMIRALTY

CIVIL ACTION NO.: 2:20-cv-01968-BHH

SHIRRESE B. BROCKINGTON, AS)
THE SPECIAL ADMINISTRATOR)
OF THE ESTATE OF TIMOTHY)
NEWSOME,)
Plaintiff,)
v.)
CAROL ANN SWORD CORP., TODD)
KEVIN BELAND AND DAY BOAT)
SEAFOOD, LLC,)
Defendants.)
DEFENDANT DAY BOAT
SEAFOOD, LLC'S MOTION TO
DISMISS FOR LACK OF
PERSONAL JURISDICTION

Defendant Day Boat Seafood, LLC respectfully moves this court pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure. Day Boat Seafood, LLC moves on grounds that South Carolina's Long-Arm statutes do not confer jurisdiction over it, Day Boat Seafood does not have sufficient minimum contacts with South Carolina, and Day Boat Seafood has not purposefully directed its business activities at South Carolina for this Court to exercise personal jurisdiction over it.

TURNER PADGET

s/ David S. Cobb

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ATTORNEYS FOR DEFENDANT DAY
BOAT SEAFOOD, LLC